

Notice: This application is authorized by s. 283.37, Wis. Stats., and chs. NR 151 and 216, Wis. Adm. Code. Personally identifiable information on this form may be used for other program purposes and may be made available to requestors under Wisconsin's Public Records laws and be posted on the Department's internet site.

Instructions: Complete the following for all permit applications. If additional space is needed to respond to a question, attach additional pages. Provide descriptions below that explain the program activities that you expect to develop and implement to comply with the Municipal Separate Storm Sewer System (MS4) general permit (<http://dnr.wi.gov/org/water/wm/nps/stormwater/muni.htm>). Section 3 of the MS4 general permit contains the compliance schedules that direct when the individual program activities need to be developed and submitted to the Department for review. The detailed programs that are developed and submitted to the Department for review may deviate from the program activities described below if necessary. The descriptions provided below are necessary for the Department to verify that the municipality's program activities comply with the permit.

Section I: Applicant Information

Name of Municipality

CITY OF DELAFIELD

Mailing Address

500 GENESEE ST.

City

DELAFIELD

State

WI

Postal Code

53018

County(s) in which Applicant is located

WAUKESHA

Type of Municipality: (check one)

☐ County

☒ City

☐ Village

☐ Town

☐ Other (specify)

Section II: Local Contact Information (check one):

Name of Municipal Contact Person

TOM HAFNER, P.E.

Title

DIRECTOR OF PUBLIC WORKS

Mailing Address

500 GENESEE ST.

City

DELAFIELD

State

WI

Postal Code

53018

E-mail address

thafner@ci.delafield.wi.us

Telephone Number (include area code)

(262) 646-6220

Fax Number (include area code)

(262) 646-2564

Section III: Water Quality Concerns

Yes	No	
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Does any part of the MS4 discharge to an outstanding resource water (ORW) or exceptional resource water (ERW) listed under s. NR 102.10 or 102.11, Wis. Adm. Code? (An unofficial list of ORWs and ERWs may be found on the Department's Internet site at: http://dnr.wi.gov/org/water/wm/wqs/)
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Does any part of the MS4 discharge to an impaired waterbody listed in accordance with section 303(d)(1) of the federal Clean Water Act, 33 USC § 1313(d)(1)(C)? (A list of Wisconsin impaired waterbodies may be found on the Department's Internet site at: http://dnr.wi.gov/org/water/wm/wqs/303d/303d.html)

Section IV: Area and Population Within the MS4

Yes	No	
<input checked="" type="checkbox"/>	<input type="checkbox"/>	Is the MS4 within an "Urbanized Area" as defined by U.S. EPA? (See http://www.epa.gov/npdes/pubs/fact2-2.pdf)

If no, skip the rest of this section and continue to Section V. If yes, estimate the area served by and the population within the MS4 in an Urbanized Area (UA).

(Urbanized Area maps are available on the EPA web site at: <http://cfpub1.epa.gov/npdes/stormwater/urbanmaps.cfm>)

Total municipal area (in square miles): 11 (w/ 2 mi ² in Lake N.)	Total municipal population (in year 2000): 6,472
MS4 service area within Urbanized Area (in square miles): 11	Municipal population within Urbanized Area (in year 2000): 6,472

Section V: Potential Permit Exemption

Yes	No	Section NR 216.023, Wis. Adm. Code, allows certain MS4s that have less than 1000 people residing in an urbanized area to be waived from having to obtain municipal storm water permit coverage.
<input type="checkbox"/>	<input checked="" type="checkbox"/>	Do you believe that the MS4 may be eligible for this potential exemption?

Section VI: Summary of Municipal Storm Water Program Activities

Describe the programs or activities the municipality is doing or will do to comply with the requirements of the MS4 general permit. Attach additional pages if necessary.

A. Public Education and Outreach

Describe the public education and outreach program activities that the municipality will implement to comply with section 2.1 of the MS4 general permit.

SEE ATTACHED

B. Public Involvement and Participation

Describe the public involvement and participation program activities that the municipality will promote to comply with section 2.2 of the MS4 general permit.

SEE ATTACHED

C. Illicit Discharge Detection & Elimination

Describe the illicit discharge detection and elimination program authority and activities that the municipality will develop and implement to comply with section 2.3 of the MS4 general permit.

SEE ATTACHED

D. Construction Site Pollution Control

Describe the construction site pollutant control program authority and activities that the municipality will develop and implement to comply with section 2.4 of the MS4 general permit.

SEE ATTACHED

E. Post-Construction Site Storm Water Management

Describe the post-construction storm water management program authority and activities that the municipality will develop and implement to comply with section 2.5 of the MS4 general permit.

SEE ATTACHED

F. Pollution Prevention

Describe the pollution prevention program activities that the municipality will implement to comply with section 2.6 of the MS4 general permit.

SEE ATTACHED

Section VII: Certification

I hereby certify that I am an authorized representative of the municipality that is the subject of this application for general permit coverage, and that the information provided is true and complete, to the best of my knowledge. I understand that Wisconsin law provides severe penalties for submitting false information.

Authorized Representative Name

Title

TOM HAFNER, P.E.

DIRECTOR OF PUBLIC WORKS

Signature

Date Signed

Thomas J. Hafner

5/25/06

E-mail address

Telephone Number (include area code)

Fax Number (include area code)

thafner@ci.delafield.wi.us

(262) 646-6225

(262) 646-2564

Return this completed form to:

Wisconsin Department of Natural Resources
Storm Water Program – WT/2
PO Box 7921
Madison, WI 53707-7921

ATTACHMENT

Section VI: Summary of Municipal Storm Water Program Activities Notice of Intent to Apply for Coverage Under MS4 General Permit City of Delafield, Waukesha County, WI

The City of Delafield has been extremely proactive over the last several years in implementing projects, initiatives, programs and activities in anticipation of the upcoming storm water discharge permit requirements. Following are the City's responses for items A through F of its Notice of Intent to Apply for Coverage Under MS4 General Permit. Each response indicates the applicable activities that the City has already undertaken and the activities that the City plans to undertake in the future to comply with the MS4 general permit requirements. The planned implementation schedule for the future activities is also included.

A. Public Education and Outreach

- The City has utilized its cable television access to feature educational slides on best management practices for residents to improve the water quality of storm water runoff.
- The City has conducted public informational meetings and workshops on various storm water management topics. Recent topics of these meetings have included the Dix Storm Water Quality Pond Project, implementation of Storm Water Utility #1 as a funding mechanism for the unfunded MS4 permit mandate, shoreline stabilization and habitat restoration utilizing native vegetation and bioengineering and the use of "alternative", "sustainable" or "green" storm water management practices including rain barrels, rain gardens, bio-retention/constructed wetlands, bio-infiltration, soil amendments, porous pavements, permeable pavers, turf block, green roofs, storm water treatment trains (STT) and conservation design/low impact design.
- The City has utilized its website, the local newspaper media (Lake Country Reporter, Milwaukee Journal/Sentinel and Waukesha Freeman) the City Newsletter and agenda postings in public places to encourage and promote public attendance and participation at meetings and workshops related to storm water management topics.
- The City has hired LJ Reas Environmental Consulting Corp. to conduct public education and outreach workshops regarding shoreline stabilization to prevent erosion. The first workshop was entitled *Building (and Planting) Better Shorelines* and was intended for shoreline contractors and landscaping/nursery professionals. It consisted of two sessions (February 24 and March 3, 2006). The first session focused on shoreline stabilization through native vegetation and bioengineering (including rules, regulations and the permitting process), while the second session focused on local zoning issues and designs/plans. In addition to Lisa Reas, representatives from the Wisconsin Department of Natural Resources, the County and the City Planner participated as presenters at this workshop. The workshop was very well attended. The second shoreline stabilization workshop was conducted on May 20, 2006 and was intended for land owners.

- The City hired LJ Reas Environmental Consulting Corp. to conduct a public demonstration project on May 23, 2006, demonstrating the use and installation of biolog as an effective shoreline stabilization measure.
- The City has a high quality Lake Management Plan and Aquatic Plant Management Plan that are available to the public and address storm water management issues.
- The City's Lake Welfare Committee promotes public education and outreach regarding storm water quality issues at their regular monthly meetings and annual lake meeting. The annual lake meeting is typically very well attended.
- The City's Lake Welfare Committee and Common Council recently had much public discussion and debate regarding a proposed ordinance to ban the use of lawn fertilizer containing phosphorus. The debate included opportunities for public input and experts from the fertilizer industry. Ultimately, the City did pass an ordinance such that beginning May 26, 2006, the use of lawn fertilizer containing phosphorus will not be permitted in the City of Delafield (with a few exceptions such as a lawns first growing season, land where soil tests indicate phosphorus is necessary, etc.). The City has prepared an informational flyer (copy attached) regarding the ordinance requirements and the benefits that will be realized. This flyer was provided to all retailers of fertilizer in the City and will be posted and distributed in the stores.
- The City's Common Council approved a pilot project to convert existing turf grass areas in the islands and detention area of a municipal parking lot located adjacent to the Bark River into rain gardens. The construction of the rain gardens is currently in progress. The City Engineer prepared an informational flyer (copy attached) that is available to the public in real estate flyer type boxes at the project site. The flyer explains the project, identifies the benefits of rain gardens, encourages the public to do their part in controlling storm water runoff by installing rain gardens and provides a website for further information regarding rain gardens.
- In the future, the City shall continue to implement a public education and outreach program to increase the awareness of storm water pollution impacts on waters of the state and to encourage changes in public behavior to reduce such impacts. The program shall establish measurable goals and, at a minimum, include the following elements:
 - Promote detection and elimination of illicit discharges and water quality impacts associated with such discharges from municipal separate storm sewer systems. It is envisioned that the City will utilize its newsletter, website and cable television access to educate the public regarding what constitutes an illicit discharge, the associated water quality impacts and establish a citizen complaint program to facilitate the reporting of spills and illicit discharges.
 - Inform and educate the public about the proper management of materials that may cause storm water pollution from sources including automobiles, pet waste, household hazardous waste and household practices. In addition to again utilizing the newsletter, website and cable television access to educate the public regarding this issue, the City is contemplating

a volunteer program to perform educational stenciling at storm water inlets.

- Promote beneficial onsite reuse of leaves and grass clippings and proper use of lawn and garden fertilizers and pesticides. The newsletter, website and cable television access will be used to promote the benefits of mulching, composting and proper use of lawn and garden fertilizers and pesticides (including the recently enacted phosphorus-free fertilizer ordinance requirements).
- Promote the management of stream banks and shorelines by riparian landowners to minimize erosion and restore and enhance the ecological value of waterways. The City will have LJ Reas Environmental Consulting Corp. perform additional demonstration projects as a public education and outreach effort to encourage riparian landowners to utilize native vegetation and bioengineering for shoreline stabilization and habitat restoration. Again, the newsletter, website and cable television access will also be utilized to promote this initiative.
- Promote infiltration of residential storm water runoff from rooftop downspouts, driveways and sidewalks. The City will continue to promote the benefits of rain gardens as indicated in the fifth bullet on page five. Other infiltration methods such as porous pavements will be promoted if and when their long term viability in a cold climate is proven.
- Inform and where appropriate educate those responsible for the design, installation, and maintenance of construction site erosion control practices and storm water management facilities. The City (for City construction projects) and Developers (for private construction projects) utilize professional engineers that are expected to be educated regarding erosion control and storm water management. Those responsible for the design, installation, and maintenance of erosion control practices and storm water management faculties shall be referred to the City's Construction Site Erosion Control & Storm Water Management Ordinance, which is made available on the City's website for convenience. The City Engineer shall continue to be responsible for the review and inspection of these design, installation and maintenance activities and shall provide necessary feedback intended to inform and educate.
- Identify businesses and activities that may pose a storm water contamination concern, and where appropriate, educate specific audiences on methods of storm water pollution prevention. Current land uses will be reviewed to identify potential contaminant sources. The City would likely utilize direct mailings of pollution prevention educational information to property owners with land uses that are deemed to pose a storm water contamination concern. Direct mail would likely be used as business owners are less likely than residents to utilize the newsletter, website and local government cable channel.
- Promote environmentally sensitive land development designs by developers and designers. The City will continue to suggest the use of alternative/green storm water management practices where appropriate.

The City will continue to maintain stringent, up-to-date ordinances in the areas of erosion control, storm water management, tree preservation and mitigation. The City will continue to utilize its zoning and master plan as tools to ensure environmentally sensitive land development.

- To ensure consistency and economies of scale, the City will examine the feasibility of a joint public education and outreach program with its MS4 neighboring communities and/or a “regional” program by contacting the University of Wisconsin – Extension Outreach Program.
- **Schedule** - The City shall submit a formal, written, proposed public education and outreach program to the Wisconsin Department of Natural Resources (WDNR) within **18 months of the start date** of permit coverage. The City will immediately continue to perform the types of public education and outreach efforts that it currently performs (see pages 1 and 2). Additional efforts will be implemented over the course of the two year period following the start date of permit coverage, with the full public education and outreach program implemented within **24 months of the start date** of permit coverage.

B. Public Involvement and Participation

- The City currently attempts to make public involvement and participation in public meetings as convenient as possible. The public is strongly encouraged to attend all public meetings. Meeting agendas are posted on the City website, in conspicuous locations at City Hall and provided to the local newspapers in advance of all public meetings. The Common Council currently allows for Citizen Comments on any topic (including topics that are not on the agenda) at the beginning of Council Meetings. The Common Council and Plan Commission Meetings are televised live and replayed frequently for the convenience of City residents.
- The Mayor currently holds regular office hours and the Council members are encouraged to conduct occasional district meetings to provide an additional opportunity for public involvement and participation.
- Public Informational Meetings pertaining to a specific topic are held as deemed necessary for additional public involvement and participation and have in the past included topics such as the Dix Storm Water Quality Pond Project, implementation of Storm Water Utility #1 as a funding mechanism for the unfunded MS4 permit mandate and shoreline stabilization and habitat restoration utilizing native vegetation and bioengineering.
- It is anticipated that the planned shoreline stabilization demonstration projects will utilize hands-on public involvement and participation with the installation of plants and bioengineering materials.
- The City involves children from a local school each year in the planting of a tree in celebration of Arbor Day to encourage environmental awareness and sensitivity in children.
- As identified in Section A as a way to educate the public, the City is contemplating a storm water inlet stenciling program that would involve public participation of volunteers.

- In the future, the City shall implement a program to notify the public of activities required by the MS4 General Permit and encourage input and participation from the public regarding these activities. This program shall include measurable goals for public involvement and participation and continue to comply with applicable state and local public notice requirements. This Notice of Intent (NOI) to Apply for Coverage Under MS4 General Permit will be posted on the City's website, as will the permit. The NOI and Permit will also be distributed to the Mayor, Common Council, Plan Commission, Public Works Committee and Lake Welfare Committee to make them aware of the permit requirements and solicit ideas on how to best meet the requirements.
- **Schedule** - The City shall submit a formal, written, proposed public involvement and participation program to the WDNR within **18 months of the start date** of permit coverage. The City will immediately continue to perform the types of public involvement and participation efforts that it currently performs (see above). Additional efforts will be implemented over the course of the two year period following the start date of permit coverage, with the full public involvement and participation program implemented within **24 months of the start date** of permit coverage.

C. **Illicit Discharge Detection & Elimination**

- The City currently does not have a systematic illicit discharge detection and elimination program. Concerns regarding illicit discharges and/or spills are currently addressed on a complaint basis or as detected by City staff. In order to develop an illicit discharge detection and elimination program, similar programs in other communities will be reviewed and utilized to draft a new program for the City. The new program shall address illicit discharge detection and elimination requirements, implementation and enforcement.
- The newly developed program shall include measurable goals and include all of the following:
 - An ordinance to prevent and eliminate illicit discharges and connections to the MS4. At a minimum, the ordinance or other regulatory mechanism shall:
 - Prohibit the discharge, spilling or dumping of non-storm water substances or materials into waters of the state or MS4.
 - Identify non-storm water discharges or flows that are not considered illicit discharges. Non-storm water discharges that are not considered illicit discharges include water line flushing, landscape irrigation, diverted stream flows, uncontaminated groundwater infiltration, uncontaminated pumped groundwater, discharges from potable water sources, foundation drains, air conditioning condensation, irrigation water, lawn watering, individual residential car washing, flows from riparian habitats and wetlands, fire fighting and discharges authorized under a WPDES permit unless identified by the permittee as a significant source of pollutants to waters of the state.
 - Establish inspection and enforcement authority.

- Initial field screening at all major outfalls during dry weather periods. At a minimum, field screening shall be documented and include:
 - Visual Observation – A narrative description of visual observations including color, odor, turbidity, oil sheen or surface scum, flow rate and any other relevant observations regarding the potential presence of non-storm water discharges or illicit dumping.
 - Field Analysis - If flow is observed, a field analysis shall be conducted to determine the presence of illicit non-storm water discharges or illicit dumping. The field analysis shall include sampling for recommended indicator parameters.
 - The City will most likely contract with a consultant to perform the initial field screening.
- On-going dry weather field screening of outfalls during the term of the permit. Outfalls that will be evaluated on an on-going basis and the field screening frequency shall be identified. Consideration shall be given to hydrological conditions, total drainage area of the site, population density of the site, traffic density, age of the structures or buildings in the area, history of the area and land use types. A description of this on-going field screening program shall be submitted to the WDNR. As with the initial field screening, the City will likely contract with a consultant to perform the on-going field screenings.
- Procedures for responding to known or suspected illicit discharges. At a minimum, procedures shall be established for:
 - As soon as possible, investigating portions of the MS4 that based on the results of field screening or other information indicate a reasonable potential for containing illicit discharges or other sources of non-storm water discharges.
 - Responding to spills that discharge into and/or from the MS4 including tracking and locating the source of the spill if unknown.
 - Preventing and containing spills that may discharge into or are already within the MS4.
 - Notifying the WDNR immediately in accordance with ch. NR 706, Wis. Adm. Code, in the event that the City identifies a spill or release of a hazardous substance, which has resulted or may result in the discharge of pollutants into waters of the state. The WDNR shall be notified via the 24-hour toll free spill hotline at 1-800-943-0003. The City shall cooperate with the WDNR in efforts to investigate and prevent such discharges from polluting waters of the state.
 - To the maximum extent practicable, eliminating leakage from sanitary conveyance systems into the MS4. The City's sanitary sewers are believed to be fairly leak-free as the system is relatively new (the oldest segment was installed in 1978) and composed entirely of PVC pipe.
 - Providing the WDNR with advance notice of the time and location of dye testing within a MS4. (Because the dye may get reported to

the WDNR as an illicit discharge or spill, the WDNR requires prior notification of dye testing.)

- The City shall take appropriate action to remove illicit discharges from its MS4 system as soon as possible. If it will take more than 30 days to remove an illicit connection, the WDNR shall be contacted to discuss an appropriate action and/or timeframe for removal.
- In the case of an illicit discharge that originates from the City's permitted area and that discharges directly to a municipal separate storm sewer or property under the jurisdiction of another municipality, the City shall notify the affected municipality within one working day.
- The name, title and phone number of the individual(s) responsible for responding to reports of illicit discharges and spills shall be included in the illicit discharge response procedure and submitted to the WDNR.
- **Schedule** - The City shall submit the proposed illicit discharge detection and elimination ordinance to the WDNR **within 24 months of the start date** of permit coverage. The City shall adopt the illicit discharge detection and elimination ordinance **within 30 months of the start date**.

The City shall submit the proposed illicit discharge response procedures to the WDNR **within 24 months of the start date** of permit coverage. The City shall implement the illicit discharge response procedures **within 30 months of the start date**.

The City shall complete dry-weather initial field screening at major outfalls **within 36 months of the start date** of permit coverage.

The City shall submit the proposed on-going field screening program to the WDNR **within 36 months of the start date** of permit coverage. The City shall implement the on-going field screening program **within 48 months of the start date**.

D. Construction Site Pollutant Control

- The City already has an ordinance in place that requires erosion and sediment control at construction sites and establishes sanctions to ensure compliance. Chapter 23 of the City's Municipal Code consists of the City's Construction Site Erosion Control and Storm Water Management Ordinance. This Ordinance needs to be examined to determine if the erosion and sediment control requirements are current with ss. NR 151.11 and 151.23, and NR 216.46 Wis. Admin. Code requirements. This City Ordinance is actively used by City staff in current land development and construction activities for public and private projects.
- Construction plans for any development or redevelopment of private or public properties within the City are subjected to a thorough review process regarding erosion control and construction storm water management prior to approval. Erosion control and construction storm water management plans prepared by engineering consultants are reviewed extensively by the City Engineer and Public Works Committee.

- The City Engineer currently inspects and enforces the Construction Site Erosion Control and Storm Water Management Ordinance. Inspections are performed at each construction site on a monthly basis except when construction operations are not actively ongoing during the winter months, during which time inspections are performed on an as-needed basis as determined by City staff or initiated on a complaint basis. Each inspection is followed-up with a written report providing a summary of the status of the erosion control and construction storm water management being performed on-site and a list of corrective actions required.
- In the future the City will review, and revise as determined to be necessary, its Construction Site Erosion Control and Storm Water Management Ordinance (in appropriate format based on the applicable State model ordinance), procedures for performing inspections and enforcement, and procedures for receipt and consideration of applicable information submitted by the public.
- **Schedule** - The City shall submit its construction site pollutant control ordinance (with any proposed additions, revisions or modifications) to the WDNR **within 18 months of the start date** of permit coverage. The City shall adopt any changes to the construction site pollutant control ordinance within **24 months of the start date**. The existing ordinance shall continue to be enforced until any changes becomes effective.

The City shall submit formal, written, proposed construction site inspection and enforcement procedures to the WDNR **within 18 months of the start date** of permit coverage. The City shall implement any changes to the current construction site inspection and enforcement procedures **within 24 months of the start date**.

E. Post-Construction Storm Water Management

- The City already has an ordinance in place that requires control of the quantity and quality of discharges from areas of new development and redevelopment, after construction is complete. Chapter 23 of the City's Municipal Code consists of the City's Construction Site Erosion Control and Storm Water Management Ordinance. This Ordinance needs to be examined to determine if the post-construction storm water management requirements are current with ss. NR 151.12 and 151.24, and NR 216.47 Wis. Admin. Code requirements. This City Ordinance is actively used by City staff in current land development and construction activities for public and private projects.
- Construction plans for any development or redevelopment of private or public properties within the City are subjected to a thorough review process regarding post-construction storm water management prior to approval. Post-construction storm water management plans prepared by engineering consultants are reviewed extensively by the City Engineer and Public Works Committee.
- The City Engineer currently inspects the construction of, and reviews/approves the as-builts for, all post-construction storm water management devices (storm water ponds, infiltration basins, Stormceptors, rain gardens, etc.) to ensure conformance with the approved plans.

- The City currently requires perpetual Storm Water Maintenance Agreements for all new development and redevelopment. The City has prepared a standard template document for this purpose.
- In the future the City will review, and revise as determined to be necessary, its Construction Site Erosion Control and Storm Water Management Ordinance (in appropriate format based on the applicable State model ordinance) as well as its procedures contained in the current Storm Water Maintenance Agreements to ensure long-term maintenance of storm water management facilities.
- **Schedule** - The City shall submit its proposed post-construction storm water management ordinance (with any proposed additions, revisions or modifications) to the WDNR **within 18 months of the start date** of permit coverage. The City shall adopt any changes to the post-construction storm water management ordinance within **24 months of the start date**. The existing ordinance shall continue to be enforced until any changes becomes effective.

The City shall submit formal, written, proposed long-term maintenance procedures to the WDNR **within 18 months of the start date** of permit coverage. The City shall implement any changes to the current long-term maintenance procedures **within 24 months of the start date**.

F. Pollution Prevention

- The City currently performs routine inspection and maintenance of municipally owned or operated structural storm water management facilities to maintain their pollutant removal operating efficiency. The City has a formal, written operation and maintenance manual that was written specifically for the I-94/Hwy. 83 Regional Storm Water Quality Pond (Dix Pond).
- The City currently performs routine street sweeping and cleaning of catch basins with sumps where appropriate. The street sweeping is contracted out and the catch basin sump cleaning is performed by City personnel with the City's vac-truck.
- The City currently properly disposes of its street sweeping and catch basin cleaning waste. The City loads the street sweeping waste into special containers provided by Onyx and pays Onyx to remove the containers and dispose of the contents properly.
- The City currently strives to apply only as much road salt and sand as is necessary to maintain public safety. This is done for not only environmental but also financial concerns.
- The City currently does not collect leaves and grass clippings and will promote (through the Public Education and Outreach Program) on-site beneficial reuse.
- The City will perform storm water pollution prevention planning for municipal garages, storage areas and other sources of storm water pollution from municipal facilities.
- The City currently does not apply any lawn and garden fertilizers on municipally controlled properties. The City does apply a weed killer once a year to the three baseball diamonds (Firemen's Park, The Legion and Fish Hatchery) in the City.

The City is planning on expanding the weed killer application to some road islands and additional park area due to a significant dandelion nuisance issue.

- The City currently trains its personnel (DPW staff) that are involved with implementing the pollution prevention practices identified.
- In the future the City will formalize its pollution prevention practices into a proposed written program with appropriate Standard Operating Procedures (SOPs). Prior to formalizing the SOPs, the City will review and take into consideration both the WDOT "Highway Maintenance Manual", Chapter 35, for guidelines on application of road salt and other deicers and the WDNR source water assessment program information for measures to reduce municipal sources of storm water contamination within source water protection areas.
- **Schedule** - The City shall submit its proposed pollution prevention program to the WDNR **within 24 months of the start date** of permit coverage. The pollution prevention program shall be implemented **within 30 months of the start date**.

The following items are not part of the NOI application; however, they are included to demonstrate the City's understanding of the totality of the permit requirements.

G. Storm Water Quality Management

- The City has already performed numerous storm water quality management projects in an effort to be proactive in anticipating the need to fulfill the Total Suspended Solids (TSS) reduction requirements. The recent projects include the Dix Regional Storm Water Quality Pond, Milwaukee Street Drainage Improvements, drainage improvements made as part of the Genesee Street Reconstruction and Main/Wells Street Reconstruction, the Municipal Parking Lot Rain Garden Project, shoreline stabilization demonstration projects, storm water quality management facilities for private developments and various other projects.
- The City shall develop and implement a municipal storm water management program to achieve compliance with the developed urban area performance standards of ss. NR 151.13(2), Wis. Adm. Code. To the maximum extent practicable, the City will implement storm water management practices necessary to achieve the 20% TSS reduction required by March 10, 2008 and 40% TSS reduction required by March 10, 2013. The City will hire an engineering consultant to review the MS4 modeling guidance available at the WDNR website and to perform the required storm water modeling.
- The City shall evaluate all municipal owned or operated structural flood control facilities to determine the feasibility of retrofitting to increase TSS removal from runoff.
- Assessment of reduction requirements shall be performed by conducting a pollutant-loading analysis using a WDNR approved model.
- **Schedule** – The City intends to conduct the pollutant-loading analysis as soon as possible (inventory and mapping are needed first). The City intends to complete the evaluation of flood control structures and assessment of compliance and submit the results to the WDNR **by March 10, 2008 or within 24 months of the start date** of permit coverage.

H. Storm Sewer System Map

- The City currently does not have a municipal storm sewer system map.
- The City Council has already budgeted funds to implement a Geographical Information System (GIS), which will include inventorying and mapping the municipal storm sewer system. A consultant will be retained to implement the GIS. The MS4 map will include all elements required in 2.8 of the permit.
- **Schedule** – The City shall submit the MS4 map to the WDNR within **24 months of the start date** of permit coverage.

I. Annual Report

- The City intends to submit its initial Annual Report by March 31, 2008 (to report on activities since the permit start date) and annually thereafter by March 31. The Annual Report shall include the information required in 2.9 of the permit. The City shall invite the municipal governing body, interest groups and the general public to review and comment on the annual report.

J. Reapplication for Permit Coverage

- The City intends to apply for reissuance of this permit in accordance with the requirements of ss. NR 216.09, Wis. Admin. Code, at least 180 days prior to this permit's expiration date.